NOTICE OF INTENT

California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403

Notice of Consideration of Waste Discharge Requirements
For Hydrogen Peroxide Injection Activities
By Jackson Family Investments, Inc.
At Olivet Ranch
3739 Piner Road
Santa Rosa, California 95403
Sonoma County

Notice of Groundwater Remediation Activities under Cleanup and Abatement Order No. R1-2001-0201, specific remediation activities consist of injection of a dilute (0.5%) hydrogen peroxide (H2O2) solution into the shallow groundwater at the property at 3739 Piner Road, Santa Rosa California.

Background: On June 12, 2001, Jackson Family Investments, Inc. (JFI) was notified that a clandestine drug manufacturing operation had led to the discharge of chemical wastes and residues into an abandoned shallow cistern on the property. Under the oversight of the North Coast Regional Water Quality Control Board (Regional Water Board), JFI initiated the sampling and analysis of several domestic and irrigation wells at nearby properties; no impacts from the contaminants at the Site were identified in these groundwater samples. Several phases of investigation were conducted at the Site. These investigations included installation of numerous borings from which soil and groundwater samples were collected, construction of six groundwater-monitoring wells, and routine quarterly groundwater sampling and reporting.

Results of these investigations indicated that soil impacts were limited to the immediate vicinity of the abandoned cistern and that the primary contaminant in the groundwater was total petroleum hydrocarbons (TPH) as Coleman fuel. Other petroleum-related compounds, such as benzene, toluene, ethylbenzene, and total xylenes (BTEX), were also detected and appear to be associated and co-located with the Coleman fuel. The impacted groundwater is limited to a roughly circular area near the central portion of the Site, approximately 130 feet from the northern property boundary.

On July 2, 2003, a remediation work plan was submitted to the RWQCB describing the proposed cleanup of the contaminated groundwater. The selected cleanup approach consists of injecting 425 gallons of dilute H2O2 (0.5%) into each of three injection wells and into the well that has been installed in the abandoned shallow cistern. The H2O2 will increase the oxygen levels in the groundwater, thus facilitating increased growth of natural microorganisms that degrade these contaminants. The solution is several times more dilute than typical household H2O2, which is generally at a concentration of 3%. The injection process is anticipated to take one day and will be repeated every two weeks for about six months (i.e., 12 injection events). Quarterly groundwater sampling will continue and the data will be evaluated to assess the progress of the groundwater cleanup.

The Regional Water Board will accept any evidence that is reasonably relevant to the following issue: Should the Regional Water Board issue General Waste Discharge Requirements to JFI for the treatment of contaminated groundwater at the Site. All interested persons should send comments to the Regional Water Board at 5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403, attention Colleen Stone. Ms. Stone can be reached at (707) 576-2831.

The tentative order, related documents, and comments received are on file and may be inspected and/or copied at the Regional Water Board office. If you want to inspect the file, please call the Regional Water Board at (707) 576-2220 for an appointment.

These Requirements will be issued pursuant to Order No. R1-2000-51 (General Waste Discharge Requirements for Addition of Oxygen Releasing Compounds to Groundwater) in thirty days from the date of this notice unless the Executive Officer receives information that indicates the project may not meet the intent of Order No. R1-2000-51.

Catherine Kuhlman
Executive Officer

August 22, 2003